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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

**PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION FOR ENTRY OF
AN ORDER TO SHOW CAUSE WHY
PLAINTIFFS WHO HAVE SUBMITTED
NON-BONA FIDE RECEIPTS SHOULD
NOT BE DISMISSED WITH PREJUDICE**

This Document Relates to:

Jane Doe 693827 v. UBER
TECHNOLOGIES, INC., et al.,

Case No. 3:24-cv-09515-CRB, MDL ID 2774

1 Plaintiffs take allegations of fraud seriously. Plaintiffs' Counsel has been vigilant in
2 screening evidence submitted to this Court. Plaintiffs' Counsel has never knowingly or
3 intentionally submitted a false or forged receipt.

4 Defendants' allegations relating to MDL ID 1384 are based on a prior, unrelated litigation.
5 These purported bad acts should not be read into the litigation history of MDL ID 2774. No
6 such receipt or document has been submitted in MDL ID 2774. There are numerous non-
7 fraudulent reasons that a user such as Plaintiff might be unable to access and produce a receipt
8 from the ride – the ride could have been ordered by another person or the user might have lost
9 access to the Uber account, for instance. That is, just because Plaintiff has not produced a ride
10 receipt in this litigation does not automatically mean she is acting nefariously.

11 In order to adequately respond to Defendant's Motion, Plaintiff should be afforded the
12 opportunity to present a bona fide ride receipt. However, despite repeated efforts to do so,
13 Plaintiff's Counsel has been unsuccessful in reaching Plaintiff MDL ID 2774. This lack of
14 communication means Plaintiff's Counsel is unable to conduct a proper search to identify
15 potentially responsive documents to Defendant Uber's request.

16 Plaintiff's Counsel respectfully requests that the Court allow 45 days to continue to attempt
17 to contact Plaintiff to resolve these alleged deficiencies. Plaintiff's Counsel is unable to
18 meaningfully respond without Plaintiff's assistance and Plaintiff's Counsel thus far is unable to
19 obtain that assistance. Plaintiff respectfully seeks additional time to identify and produce a bona
20 fide receipt and respond to Uber's Motion.

21 CONCLUSION

22 For the reasons described herein, Uber's motion should be denied allowing Plaintiffs'
23 counsel an additional 45 days to attempt to get in contact with Plaintiffs to resolve these
24 discrepancies.

DATED: September 5, 2025

Respectfully Submitted,

/s/ Sadi R. Antonmattei-Goitia

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CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants.

By: /s/ Sadi R. Antonmattei-Goitia
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